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BROWN

IRECO Incorporated

RCRA Implementation Branch

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4 August 1988

Mr. Brent C. Bradford  
Executive Secretary  
Utah Solid and Hazardous Waste Committee  
Bureau of Solid and Hazardous Waste  
P.O. Box 16690  
Salt Lake City, UT 84116-0690

Re: Lehi Plant, Site A, EPA ID No. UTD070546445,  
Closure Plan

Dear Mr. Bradford:

In response to your letter of 28 June 1988, IRECO has incorporated the suggested modifications for chemical residue analysis into the approved Closure Plan. A copy of the above-referenced Closure Plan with the specified modifications is enclosed. The modifications include analyzing for TNT, RDX and PETN. IRECO also will run the suggested EPA methods for reactivity on a composite sample, in addition to the reactivity method described in the Closure Plan.

In regard to the requested reactivity analyses, IRECO has reviewed the document that we received from EPA, Region VIII, titled "Methods of Evaluating Explosives Reactivity of Explosive Contaminated Solid Waste Substances," by Pittsburgh Research Center, Bureau of Mining, U.S. Department of the Interior. The document outlines two different reactivity test, Gap test and Internal Ignition Test (IIT). We are familiar with the Gap test and are capable of running a variation of the test. We do not possess an apparatus capable of monitoring the velocity continually. However, validation of the Gap test can be determined by visual inspection of the pipe as outlined in the test procedures. We are not familiar with the Internal Ignition Test but plan to analyze a composite sample by that procedure.

In regard to the requested chemical analyses, we have added a requirement to analyze for TNT, RDX and PETN using a method normally used at IRECO (specified in the Plan). For the purpose

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**The Explosives Technology Company**

Mr. Brent C. Bradford

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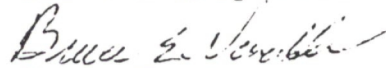
4 August 1988

of determining whether the soil must be reburned, we have defined "clean closure" as constituting 0.1% or less of the total amounts of TNT, RDX and PETN combined. One tenth percent of explosives in soil is at least 30 times lower than the minimum concentrations that can cause contaminated soil to test as reactive. Because TNT, RDX and PETN are not Appendix VIII hazardous constituents, we think that any benefit achieved by reduction below the 0.1% level is outweighed by the negative potential consequences of dumping fuel oil on the soil in order to reburn it.

If you have any questions or comments, please contact me at this office.

Very truly yours,

IRECO Incorporated

  
Bruce E. Venable

BEV/hbg  
Enclosure

cc w/enc: Clark Bonner, Site A

Larry Wapensky, EPA, Region VIII

cc w/o enc: Dr. Joseph Miner, City-County Health Dept.  
of Utah County

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Mr. Brent C. Bradford  
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bcc: SEH  
SRP

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